

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

Division

**FILED**

NOV 15 2021 DB

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF TN.

Isabella Theodoro  
Peter Theodoro

Case No.

**03-21 0860**

(to be filled in by the Clerk's Office)

*Plaintiff(s)*

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

The State of Connecticut Department of Children and  
Families, and others (see attached)

*Defendant(s)*

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Isabella Theodoro and Peter Theodoro		
Address	100 Powell Place #1177		
	Nashville	TN	37204
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Davidson County		
Telephone Number	201-336-4375		
E-Mail Address	lzadoro15@gmail.com		

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

## Defendant No. 1

Name	Department of Children and Families (DCF) - Middletown, CT		
Job or Title <i>(if known)</i>			
Address	2081 S Main St		
	Middletown	CT	06457
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number	(860) 638-2100		
E-Mail Address <i>(if known)</i>			
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

## Defendant No. 2

Name			
Job or Title <i>(if known)</i>			
Address			
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number			
E-Mail Address <i>(if known)</i>			
<input type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Defendant No. 3

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐

Individual capacity

☒

Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐

Individual capacity

☒

Official capacity

**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐

Federal officials (a *Bivens* claim)

☒

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials? see additional attached pages

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?



# List of Defendants

Isabella Theodoro and Peter Theodoro v. Department of Children and Families and others

3:21-0860

Defendant	Address and Phone	Complaint
DCF - Middletown, CT	2081 S Maine St. Middletown Ct. 06457 (860) 638-2100	Kidnapped our daughter without just cause and deliberately lied to keep her in their custody. Came to the hospital and harrassed us while I was recovering from surgery. Removed our daughter without a warrant and without any imminent threat of harm.
Vanessa Dorante DCF Commissioner	505 Hudson St. # 5 Hartford, CT 06106	Kidnapped our daughter without just cause and deliberately lied to keep her in their custody. Came to the hospital and harrassed us while I was recovering from surgery. Removed our daughter without a warrant and without any imminent threat of harm.
David Friend	2081 S Maine St. Middletown Ct. 06457 (860) 638-2100	Kidnapped our daughter without just cause and deliberately lied to keep her in their custody.
Marie Levesque Greco	2081 S Maine St. Middletown Ct. 06457 (860) 638-2100	Kidnapped our daughter without just cause and deliberately lied to keep her in their custody.
Michelle Peterson Tompkins	2081 S Maine St. Middletown Ct. 06457 (860) 638-2100	Kidnapped our daughter without just cause and deliberately lied to keep her in their custody.
Lisa Sedlock Reider	2081 S Maine St. Middletown Ct. 06457 (860) 638-2100	Kidnapped our daughter without just cause and deliberately lied to keep her in their custody.
Susan Woodworth Narotsky	2081 S Maine St. Middletown Ct. 06457 (860) 638-2100	Kidnapped our daughter without just cause and deliberately lied to keep her in their custody.

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U.S. DISTRICT COURT  
MIDDLE DISTRICT OF TN.



Brenda Partyka	2081 S Maine St. Middletown Ct. 06457 (860) 638-2100	Kidnapped our daughter without just cause and deliberately lied to keep her in their custody. Came to the hospital and harassed us while I was recovering from surgery. She laughed at us and mocked us for begging her not to take our child. She tried to abuse her power to force the physician to kick us out of the hospital after they kidnapped our child even though my hematocrit was severely low, I was still in a lot of pain and I was told I would be able to stay at the hospital to pump breastmilk for my newborn.
Judge Norma L Sanchez-Figueroa	1 Court St Middletown, CT	Acted biased and prejudiced against our case and our family. She had a conflict of interest due to the fact that she is related to the foster mom. She refused to treat us fairly or allow us to present any of our evidence proving that we did nothing wrong and that we were loving nurturing parents.
Frank LaMonaca	1 Court St Middletown, CT	Tried to force us to plead guilty to child neglect (a crime we did not commit) and threatened to TPR us and adopt our daughter to foster parents if we did not accept his plea deal. He also threatened us with jail time for wanting to choose our own mental health provider. Bullied us in court and refused to treat us fairly about the facts of our case. Used his status to manipulate the judge into refusing to hear our evidence or allow us to have a fair trial.
Maribelle Sparks	21 Friendship St Willimantic, CT 06226	Lied about us and our family. Emotionally abused us and slandered us and our family on social media. Emotionally and physically abused and our daughter. The foster parents also abused their power as state employees to gain favors with the court to keep our child in their custody.
Michael Sparks	21 Friendship St Willimantic, CT 06226	Lied about us and our family. Emotionally and physically abused our daughter. They abused their power as state employees to gain favors with the court.
Governor Ned Lamont	210 Capitol Ave. Hartford, CT 06106	Allowed our daughter to be kidnapped and held in custody without just cause
Susan Bysiewicz Lt. Governor CT	210 Capitol Ave. Hartford, CT 06106	Allowed our daughter to be kidnapped and held in custody without just cause
William Tong Attorney General CT	165 Capitol Ave Hartford, CT 06106	Allowed our daughter to be kidnapped and held in custody without just cause



Senator Chris Murphy	120 Huyshope Ave, Suite 401 Hartford, CT 06106	Allowed our daughter to be kidnapped and held in custody without just cause. Ignored our complaints that the CT DCF workers were abusing their power to unjustly keep our child in their custody. Declared on social media and to the public that our story was a "hoax" to defraud the internet for money and that our daughter did not exist!
Mayor of Middletown, CT Benjamin Florsheim	245 Dekovan Dr Middletown, CT 06457	Allowed our daughter to be kidnapped and held in custody without just cause
Bobby Knoll Peterson Middletown Chief of Staff	245 Dekovan Dr Middletown, CT 06457	Allowed our daughter to be kidnapped and held in custody without just cause
Linda Desena Executive Assistant (Middletown)	245 Dekovan Dr Middletown, CT 06457	Allowed our daughter to be kidnapped and held in custody without just cause
Joy Collins Executive Assistant II (Middletown)	245 Dekovan Dr Middletown, CT 06457	Allowed our daughter to be kidnapped and held in custody without just cause
Diana Fragomeni Administrative Secretary III (Middletown)	245 Dekovan Dr Middletown, CT 06457	Allowed our daughter to be kidnapped and held in custody without just cause
Matt Lesser State Senator District 9	300 Capitol Ave Room 2800 Hartford, CT 06106	Allowed our daughter to be kidnapped and held in custody without just cause. Ignored our complaints that the CT DCF workers were abusing their power to unjustly keep our child in their custody. Declared on social media and to the public that our story was a "hoax" to defraud the internet for money and that our daughter did not exist!
Mary Daugherty Abrams State Senator District 13	300 Capitol Ave Room 3000 Hartford, CT 06106	Allowed our daughter to be kidnapped and held in custody without just cause
Quentin Phipps	300 Capitol Ave Hartford, CT 06106	Allowed our daughter to be kidnapped and held in custody without just cause
Joseph Serra	300 Capitol Ave Hartford, CT 06106	Allowed our daughter to be kidnapped and held in custody without just cause

Middlesex Hospital	2081 S Maine St. Middletown, CT 06457  (860) 638-2100	<p>My husband and I were traveling through the state of Connecticut while I was 38 weeks pregnant, headed on a weekend trip to Maine when I started having some back pain and we decided to stop at a local hospital to make sure everything was ok with our baby. We agreed only to a quick ultrasound and a "just in case" IV was place in my arm. The ultrasound scan showed that neither the baby nor I was in any distress and when checked, my cervix was not dilated. We then asked to leave and be on our way. The hospital staff refused to allow us to leave and started threatening to have us arrested for child endangerment for driving out of state while pregnant. They kidnapped us inside the hospital. The hospital staff claimed we looked "suspicious for traveling as a biracial couple," put the entire maternity ward on lockdown, forcibly sedated me and performed a c-section against my will, without my consent and without medical necessity. After the surgery, they told us they had called the CT DCF to "come get our baby!" When we asked why, they would not say why. They tortured and terrorized us for the next 4 days in the hospital. They refused to give me my prescribed diabetes and blood pressure medicines until it made me very very sick. They refused to give me a blood transfusion after the surgery where I nearly bled to death. They took our infant daughter from us, kept us from seeing and getting to bond with her for the majority of our stay, refused to allow me to breastfeed her and refused to allow us to even leave our room except for during her "scheduled feeds!" They held us inside our room with armed security guards. They emotionally, physically, and psychologically abused and tortured us. They called us racist derogatory names. They took our child from us at 3 days old on "predictive neglect" claiming they believed we were "homeless drug addicts, Muslim Terrorists, and criminals running from the law." None of it was ever true but the judge never treated us fairly or allowed us to present any of our evidence and the foster mother they had given our daughter to a court clerk in the same court system. They never had any</p>
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Middlesex Hospital (Cont.)		<p>matter over our child but violated our rights and caused us great emotional and physical suffering just to keep her in their custody for profit. The hospital staff and the CT DCF all deliberately lied in their reports to justify what they did to us and to appease their friend the foster mother who wanted to adopt our child. That was two years ago and we never got our daughter back despite the fact that we have 3 other healthy children in TN. We have not been allowed to even see her in person in over 10 months. We are suing for both actual and punitive damages.</p>
Ahmet Semh Gork	<p>2081 S Maine St. Middletown, CT 06457  (860) 638-2100</p>	<p>Collectively cooperated to hold us against our will, perform c-section without my consent, against my will, that was not medically necessary; kept us from getting to see our child; harassed, threatened, abused, berated and otherwise psychologically and physically tortured and terrorized us daily while we were in the hospital after the birth of our only daughter; made racially derogatory remarks, comments and accusations against us that were not true; refused to allow me to breastfeed or have professional photos done with our infant daughter, refused to allow us to leave our room, refused to allow our family to visit us, illegally performed searches on our personal items in our room while we were visiting our child in the nursery, refused to allow our baby to room-in with us despite the fact that we had done nothing wrong and our baby was in no "imminent danger;" had our child taken from us at 3 days old by the CT DCF on false accusations that we "did not cooperate!"</p>
Anne S Bingham	<p>2081 S Maine St. Middletown, CT 06457  (860) 638-2100</p>	<p>See Middlesex Hospital</p>
Clara E McLeod	<p>2081 S Maine St. Middletown, CT 06457  (860) 638-2100</p>	<p>See Middlesex Hospital. She also lied in my medical records and reports saying I was in "active labor" when we got to the hospital. I was not in labor, I was not having contractions, and my cervix was not dilated. She detained us, and sedated me in the hospital against our will and performed a C-section that was not medically necessary without my consent.</p>



Cliff M. O'Callahan	2081 S Maine St. Middletown, CT 06457	See Middlesex Hospital
Cynthia Demott	2081 S Maine St. Middletown, CT 06457  (860) 638-2100	See Middlesex Hospital. Made racially derogatory remarks, comments and jokes. After I asked her to stop harassing me about whether my husband was an "illegal immigrant running from the law, she started lying about our daughters bloodsugar levels and snatching my newborn daughter from me everytime she came into our room while I was in the middle of trying to nurse her telling me that she had to take our child to the nursery but wouldn't tell us why. Each and every time she took her from us, we had to fight with her to give us our daughter back instead of take her to the nursery to get her away from us. She told me that I was "not supposed" to be breastfeeding my daughter. Then the last time she lied and claimed our daughters bloodsugar levels were higher than they actually were and got the Nurse practitioner to take her from our room without our consent. Then while I was complaining about her to the Chief nurse, she started screaming at me that she wanted to stay and hear my complaint. I asked her to leave the room multiple times and she continued screaming that "she deserves to know what I was complaining about." When they finally forced her to leave the room, She threatened us saying "you better watch it honey, because I will be the one taking care of your baby in the special nursery tonight!"
Laura G Bony	2081 S Maine St. Middletown, CT 06457  (860) 638-2100	See Middlesex Hospital and Clara E McLeod. She made derogatory, false accusations that I was "mentally ill and displaying symptoms of paranoid schizophrenia." Not only did she detain me against my will to kidnap my daughter right out of my body, but she also was not an expert in this field. She was just trying to say anything derogatory about me to justify holding me against my will. She called the psych ward and tried to have me committed because she knew that I was going to complain that she held me against my will and forced the c-section. I was later examined by three psychiatrists who all wrote in their reports that I was sane and not a threat to myself or others.



Tina Rita Bafumi	2081 S Maine St. Middletown, CT 06457  (860) 638-2100	See Middlesex Hospital. Collectively cooperated to hold us against our will, perform c-section without my consent, against my will, that was not medically necessary; kept us from getting to see our child; harassed, threatened, abused, berated and otherwise psychologically and physically tortured and terrorized us daily while we were in the hospital after the birth of our only daughter; made racially derogatory remarks, comments and accusations against us that were not true; refused to allow me to breastfeed or have professional photos done with our infant daughter, refused to allow us to leave our room, refused to allow our family to visit us, illegally performed searches on our personal items in our room while we were visiting our child in the nursery, refused to allow our baby to room-in with us despite the fact that we had done nothing wrong and our baby was in no "imminent danger;" had our child taken from us at 3 days old by the CT DCF on false accusations that we "did not cooperate!"
Carmilla	2081 S Maine St. Middletown, CT 06457  (860) 638-2100	See Middlesex Hospital. Made racially derogatory remarks, comments and jokes. Refused to give me my prescribed medicines. Mocked and made fun of me as I was vomiting and getting very sick from not taking my medicines. Told me that I was "faking it" and just "working myself up on purpose to get sympathy."
Antonio Lopera	2081 S Maine St. Middletown, CT 06457  (860) 638-2100	See Middlesex Hospital. Acted very unprofessional while we were complaining about how we had been treated by the abusive staff. Mocked us and laughed at us at times while we were complaining.
Dr. Jesse Wagner	2081 S Maine St. Middletown, CT 06457  (860) 638-2100	See Middlesex Hospital. Never responded to the many complaints I send him about how we were treated at Middlesex hospital. Refused to come to my room and speak with us.
Alyssa Glasow	2081 S Maine St. Middletown, CT 06457  (860) 638-2100	See Middlesex Hospital



Amber Hammond	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Britney Ciesiolka	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Brittany Gavin	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Catherine Moshier	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Erin Huckle	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Golda Palmer	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Heather Mejza	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Jenifer Cote	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital

Jessica Callahan	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Kathleen Miclette	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Maryanne R Roegiers	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Nichlos M Markey	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Rebecca Nixie	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Susan Currie	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Dr. Julie S. Flagg	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Dr. Erica B Smith	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital



Katie Spiess - Nurse	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	See Middlesex Hospital
Laura V Pittari	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	Same as Above. Deliberately lied on numerous affidavits to the court to justify holding us prisoners inside their hospital, forcing a C-section on me against my will that was not medically necessary and taking our daughter from us at 3 days old.
Sarah Lenon	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	Same as Above. Deliberately lied on numerous affidavits to the court to justify holding us prisoners inside their hospital, forcing a C-section on me against my will that was not medically necessary and taking our daughter from us at 3 days old.
Laura Napierkowski	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	Same as Above. Searched our belongings while at the hospital without our consent. Took legal documents from our bag and tried to cover it by saying that she was "just tidying the room!"
Marissa Goodnight	2081 S Maine St. Middletown, CT 06457 (860) 638-2100	Same as Above. Went on Social Media and disclosed our private health information, thereby violating HIPAA laws.
Middlesex Hospital Security Office	28 Crescent St Middletown, CT 06457 (860) 638-2100	Illegally detained us against our will inside the hospital so that the hospital could perform an illegal c-section on my body without my consent to kidnap our newborn daughter.
ViaCord Processing Center	2375 Progress Dr Hebron, KY 41048	Refused to pick up our daughters cord blood claiming that the "hospital staff told her we were illegal imigrants"
CT DCF Ombudsmans office	505 Hudson Street Hartford, CT. 06106	Ignored our complaints that the CT DCF workers were abusing their power to unjustly keep our child in their custody. Ignored our complaints that our daughter was being abused in DCF care and that we and our family were being racially discriminated against and that we were not being treated fairly.



John C. Geragosian State Auditor	165 Capitol Ave Hartford, CT 06106	Ignored our complaints that the CT DCF workers were abusing their power to unjustly keep our child in their custody. Ignored our complaints that our daughter was being abused in DCF care and that we and our family were being racially discriminated against and that we were not being treated fairly.
Robert K. Jane State Auditor	165 Capitol Ave Hartford, CT 06106	Ignored our complaints that the CT DCF workers were abusing their power to unjustly keep our child in their custody. Ignored our complaints that our daughter was being abused in DCF care and that we and our family were being racially discriminated against and that we were not being treated fairly.
Office of the child Advocate	18-20 Trinity Street Hartford, CT 06106	Ignored our complaints that the CT DCF workers were abusing their power to unjustly keep our child in their custody. Ignored our complaints that our daughter was being abused in DCF care and that we and our family were being racially discriminated against and that we were not being treated fairly.
Susan Woodworth Narotsky	2081 S Maine St. Middletown Ct. 06457 (860) 638-2100	Kidnapped our daughter without just cause and deliberately lied to keep her in their custody.
Brenda Partyka	2081 S Maine St. Middletown Ct. 06457 (860) 638-2100	Kidnapped our daughter without just cause and deliberately lied to keep her in their custody. Came to the hospital and harrassed us while I was recovering from surgery. She laughed at us and mocked us for begging her not to take our child. She tried to abuse her power to force the physician to kick us out of the hospital after they kidnapped our child even though my hematocrit was severely low, I was still in a lot of pain and I was told I would be able to stay at the hospital to pump breastmilk for my newborn.
Glaster Gopie	2081 S Maine St. Middletown Ct. 06457 (860) 638-2100	Authorized the removal of our daughter at birth without any just cause.

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- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Defendants are all employees of a state agency known as the Department of Children and families. All violations mentioned above were committed while actively performing their jobs for the state agency.

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### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

The events started at Middlesex Hospital in Middletown, CT and continued to occur at the Department of Children and Families's office located at 2081 S Main St in Middletown, CT.

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- B. What date and approximate time did the events giving rise to your claim(s) occur?

The events occurred over a period of times ranging from November 9th, 2018 and continue to present day.

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- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

See additional attached page for a brief summary

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#### **IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Great emotional and physical suffering. See additionally attached pages for details.

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#### **V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

See attached pages



## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

11/13/21

Signature of Plaintiff

Printed Name of Plaintiff

Isabella Theodore / for Theodore  
Isabella Theodore / for Theodore

### B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

## UNITED STATES DISTRICT COURT

for the  
Middle District of Tennessee

*Isabella Theodoro and Peter Theodoro*  
v.  
*Middlesex Hospital (Middletown, CT) and others.*

### **Abstract:**

Two years ago, on November 9<sup>th</sup>, 2018, my husband and I were driving through Connecticut after visiting family for a memorial service while I was 38 weeks pregnant. We stopped at a local hospital for some back pain I was having to make sure everything was ok with the baby. We were brutally attacked by the hospital staff there at Middlesex hospital in Middletown who told us we were “liars” and that they did not believe we were actually from Tennessee. Everything we said they called us “liars!” I have never been so terrified in my whole life! They put the entire maternity ward on lockdown saying they believed we were “homeless drug addicts, Muslim Terrorists and criminals running from the law.” The drugged me against my will, forced me to have a c-section without my consent and then told us they had called the CT DCF to “come get our baby!” The hospital staff at Middlesex hospital even tried to get us to voluntarily give our daughter up by telling us that she “looked Chinese” and that “we probably wouldn’t want her anyway!” We told them to stop harassing us and they just laughed!

They tortured and terrorized us inside the hospital for the next 4 days, kept us from seeing our child and keep me from getting to breastfeed her calling me a “disgusting drug addict” even though all of my and the baby’s drug screens were negative.

They forced me to have her on the Friday of a holiday weekend and even though I had signed medical release papers for my prenatal care, they said they would not be able to get the records until the following Tuesday. They had an “after hours” CT DCF worker come take her from us on the Monday before the records ever got there because they told us we looked “too suspicious” and that they were required take her to the Pediatrician in CT 3 days after she was released from the hospital and that they “KNEW we would not take her!” ( The DCF workers name was Brenda Partyka, a woman who was friends and neighbors with both Sarah Lennon( the nurse who called saying we looked “suspicious” and Maribelle Sparks ( the court clerk foster woman they gave her to because she was looking for a “Hispanic looking newborn baby girl” to adopt!)

We told them we would take her to any pediatrician they wanted us to and that we would pay for it out of pocket. They said they didn’t care. They intentionally kept us from getting to see her as we were being held inside our hospital room with security guards and were only allowed to go see her in the nursery during her “scheduled feeding times.” Then they claimed, “we did not care about her and that we were clearly unfit parents!” Any and every little innocent thing we said or did they would twist it around and us it against us. I was erasing some text messages off my phone that were taking up a lot of data to make room for pictures of our new baby because the memory on my phone was full and we didn’t have our camera. Sarah Lennon wrote that we were “deleting suspicious text messages so as not to implicate us in our crimes!” They asked me what medications I take, I told them I take hypertension and diabetes medicines, she asked me where the bottles were, I told her in the car. Then they wrote that I was clearly a drug addict/ drug dealer and that I had a “bag of pills with me!” They asked us where we were from, we



said TN and they called us “Liars!” Later they said they found our new minivan in the parking lot because it was registered to my name and had TN plates. They said they found it to be “messy” and believed we were living out our car! They say they took her from the hospital, they mocked us and laughed at us as we cried and begged them not to take our child. It is a crime to hold a pregnant woman against her will and forcibly induce her just to kidnap her infant and sell the child to your friends as if it were an animal to possess! It’s called child trafficking and the staff at Middlesex hospital and the CT DCF workers involved in our case need to be prosecuted criminally for kidnapping our daughter at birth when we had done nothing wrong just to give her to their friends to adopt!

They just kept attacking us one thing after another after another after another! After they took our baby girl from us, they told us all we had to do was bring our medical records to the judge to show her that I was not a drug addict and that I had in fact received prenatal care and that they would give our child back to us! It was never true.

As it turned out there was a court clerk who had been asking her friends at the DCF to help her find a “Hispanic looking newborn baby girl to adopt!” Also, as it turned out she just happen to be the Judges NIECE! By the time we had our OTC court date, this horrible abusive woman had already been given our child and promised that “if she was just patient, that she would eventually get to adopt our daughter!” The first time we met her she was so hateful to us and she told us that the Case Worker David Friend told her that I was a “drug addict” and that my husband was an “illegal immigrant” and that he told her we would “never get our daughter back!”

The judge never treated us fairly and never listened to anything we had to say or ever allowed us to submit any of our evidence showing that we were loving parents who had gotten prenatal care, how the racist hospital staff had taken advantage of us and terrorized us or that we had in fact cooperated. She never cared about anything we had to say. The CT DCF had already called us liars and so she just “took their word for it” without even giving us any opportunity to tell our side of the story. The judge refused to hear any of our evidence or treat us fairly as an unbiased party. They said the only way they would transfer our case and our child to TN was if we “pled guilty to child neglect.” Since we had done nothing wrong and because that is considered a crime in TN, we were not about to sign any such “deal” knowing that our other children would be taken from us and it would likely land us in prison! Because we refused to sign their “plea deal,” they refused to allow us to have a trial and found us “guilty of child neglect” by default!

The days turned into weeks, then into months and then into years. It was so hard having to go on without her. When the boys were born, I would just sit around all day nursing and holding them and breathing them in. After they took Sofie from us and threw us out into the snow, she was just gone, and I just couldn’t understand why. I felt so dazed and confused about what had happened and why were they doing this to us. At first, I could still feel her kicking inside of me, even though I knew she was gone. As the weeks passed Peter and I went through some pretty dark days. There were days that I just wasn’t sure I would be able to make it. In the end it was our little boys who kept us going. We knew we had to be strong for them. We had to come to the harsh realization that whether or not we ever got our daughter back, our little boys were innocent and still needed us to be there for them too! They still need us to be their mom and dad and they still need us to give them all the wonderful things that life can offer. And so, we kept trudging and waiting and trudging and waiting for the day that our poor sweet daughter would be allowed to come home to her real family. We have been waiting ever since.



Two long years now have passed. My little boys have never gotten to meet their sister they so longed for because we are still not allowed to see her in person and even if we were, we can't take our children into CT or NJ because they will be taken from us due to this open "predictive neglect" case against us. Predictive neglect is a ridiculous, unlawful concept and is nothing more than a method for child traffickers to violate people's civil rights and kidnap innocent people's children for profit! More should be done to keep greedy, prejudice hospital staff from claiming this about innocent families and being given the power to take other people's babies from them at birth!!! Predictive neglect should NOT be legal!

### **Statement of Claim**

After traveling to my husband's parents' house for a memorial service in November of 2018 while I was 38 weeks pregnant, his family suggested we should go on a short baby moon to relax and that they would watch the kids for us. My husband told me about how he and his friends used to go to Maine on vacation and eat lobster and how unbelievably beautiful it was. I have a friend from grad school who had just moved back home to Tennessee from Maine and was always telling everyone how wonderful it was and posting these incredibly beautiful pictures on Facebook. It almost looked like Alaska; it was so beautiful. We decided to take a weekend trip up there to relax, unwind and pray to help me mentally prepare for our daughter's upcoming birth. I had planned on having a completely natural birth and I had hoped the trip would bring me the serenity and peace I needed to ease my mind and give me strength. We left early on Friday Morning, on November 9<sup>th</sup>, 2019, which was a holiday weekend. We planned to stay Saturday and come back on Sunday. Our destination was about 6 hours away and about 3 hours into our trip I started having some back pain. I figured it was just from sitting for a while in the same position and didn't think I was in labor, but since I have never been in labor before, I just wanted to be sure. We were in Connecticut at the time and we stopped at a nearby hospital (Middlesex hospital in Middletown, CT) to make sure everything was ok. It was the biggest mistake of our lives!

From the moment we walked into this hospital in CT and told them we were from TN, a nurse named Sarah Lennon started attacking and threatening us saying they could have us prosecuted for child endangerment for driving long distances while pregnant. We told them we had only driven for 2 ½ hours! They started interrogating us about every aspect of our life. We told them we had been staying in New Jersey with some family after attending a memorial service. They called us liars and accused us of "living out of our car." We told them it wasn't true. They kept harassing us about my husband's "ethnicity." Then they asked me what medicines I take. I told them I take medicines for asthma, diabetes and hypertension. They asked me where the pill bottles were, I told them they were in my purse in the car. Sarah Lennon started calling me a drug addict. (she made up all these lies in her report saying all of these ridiculous things like I had a "big bag of pills with me," and that we were suspiciously deleting text messages that we thought might implicate us in our "crimes.") She demanded to know my other two children's names, birthdays and location. We told her. They started interrogating my husband if he was even the "real father" of my other two children. They kept demanding to know his "ethnicity." We reluctantly told them he is Egyptian. One nurse named Carmella started going on and on about how "the world trade center was taken down by Egyptians!" They started accusing my husband of being Muslim. We told them that he is Coptic Orthodox. Another nurse asked what that meant, and we told them it means he is Christian and showed them the tattooed cross on his arm. They said they didn't believe us. They said they "knew" he was not actually my husband and that the only way a white woman like me would be with some "Muslim



guy” is if we were some kind of criminals. They said that he “must be running from the law” and that I “must be trying to hide him.” Then they started accusing me of being a drug addict. I told them it wasn’t true. Two nurses pulled off my pants and underwear right in front of a whole room of nursing staff whom I have never met, including male staff. Before they had even given me anything to cover up with, they ordered me to further remove the rest of my clothes. I asked them to ask the male nurses to please leave while I was undressing, they refused. As I was taking off my bra, one of the male nurses turned his head and smirked. After I was forced to take off my clothes and was sitting there for at least a few minutes completely naked, a nurse tossed a fabric gown at me, giggled and said, “here honey, cover those things up.” It was completely dehumanizing and humiliating. I was then forced to urinate in a cup in front of 2 hospital staff who called me a drug addict. (my tox screen was negative) After that I went to get my clothes to put them back on to leave. Another nurse asked me what I was doing. I told her that I didn’t like the way I was being treated and that I was leaving. She apologized for what the other staff had done and said that they just get a lot of “junkies” in there and that I should at least stay long enough to get an IV and let them check my cervix checked to make sure the baby was ok. I agreed to stay only to get my cervix checked and get an IV in case anything was wrong. After they put the IV in, they brought in an ultrasound machine and said they wanted to do an ultrasound, so I agreed to that. Then the doctor came in and checked my cervix and said that I was barely 1 cm dilated, if that. She asked me if I had any medical records (but never once asked for a release for anything). I told her I thought I had my ultrasound report in my email and started looking through my phone. She finally said its fine we’ll just get it after the c-section. I told her no, I wanted to be allowed to leave to go back to New Jersey to have the baby where we were staying with family. She told me that they had me scheduled for a repeat c-section and didn’t I want to do that. I told her no that I did not want to have another c-section and that I wanted to birth my daughter naturally this time and that I wanted to leave. She said ok and left the room. Then Sarah Lennon came in and injected a clear fluid into my IV and said they were prepping me for my c-section. I told her no, I did not want to have another c-section, I wanted to be allowed to leave to have a natural birth near our family at a birthing center we had found in New Jersey. She continued to argue with me, and I told her if they didn’t let me leave, we were going to call the police and report them for holding us as hostages in the hospital against our will. She said “go ahead, the law is on our side in Connecticut and if you don’t stop resisting we are going to call the police and have you arrested for child endangerment and they will come in and chain you to the bed and force you to have the surgery anyway.” I never ever gave them permission to do the c-section or signed anything giving them permission to do so. In the medical records, the doctor (Dr. Mcleod) wrote that I was in “active labor” but it’s not true and I never felt a single contraction. They told my husband if he did not cooperate, he would not be allowed to stay and if he tried to resist being kicked out of the hospital, they would call the police and have him arrested. I started crying and feeling very drugged and woozy and I can’t remember much after that until I was sitting upright in the bed holding my baby girl in my arms and a DCF worker was sitting across from me asking me questions. A nurse named Laura Pittari kept telling her that I was a drug addict and that I “self-medicate”. I remember telling them that it wasn’t true and that I found it very offensive that they kept accusing my husband of being a Muslim and me of being a drug addict because their accusations were completely false. I don’t remember much about the interview except that she said if we don’t give them the location and access to our other two children, that they were going to take our newborn baby from us. We told her that we read that if the DCF goes into your home and sees anything they deem as messy or anything they say they don’t like, that they will take your children. She told us yes, that was a possibility and that they “do this with immigrants all the time.” After she left, Laura Pittari told us that it was the law in the state of CT that the baby has to go to see a pediatrician on her third day of life. I told her we don’t live in CT, but we would be perfectly willing to stay somewhere close by and take her to the doctor if that’s what we



had to do. She again started calling me a drug addict and told us “either we bring them our other children, or we will not be taking this baby anywhere!” I again told her that I do not self-medicate or take illicit drugs. She said, “oh yea, tell it to the judge sweetie” and left the room. I was balling my eyes out when another doctor (Dr. Bony) came in and started accusing us of not really being from Tennessee. She said they knew we weren’t really from Tennessee and that I didn’t have much of an accent. She said I didn’t sound like I was from Tennessee and that they “knew” my other children were somewhere in Connecticut. She said they “knew” Peter was not the father of my other two children and that we had better cooperate and bring them our other two children or we might never see our baby again. We told her about all the terrible things we read about them stealing people’s children in CT for no just cause and started telling her what we read about Kirsten Fauquet and her husband. She told us that anyone who believes that is stupid and we looked like the kind of people who were even “stupid enough to believe that vaccines cause autism.” We told her that we didn’t do any of the things they were accusing us of and that we just wanted to be allowed to take our baby and go home. She said that if we didn’t bring them our other children, we would probably never see our baby again and left the room.

That first day I cried all day as I held my newborn daughter in my arms. I kept falling in and out of sleep but I made sure to hold her close to me to keep her warm because my second child kept having hypothermia which eventually caused his hypoglycemia and he had to be sent to the NICU to have an IV and I didn’t want her to have to go through that invasive procedure. I also made sure to hold her in a specific way so as not smother her if I fell asleep and I continued to feed her and try to nurse her even though I knew my milk had not come it yet. As the hours went by, I could feel my blood pressure getting higher and higher. I asked my husband to go get my blood pressure medicine out of the car. The nurse came in and said he was not “allowed” to give me any outside medicine. I told them I needed to take my blood pressure medicine. The nurse named Carmella told me that the doctor had “discontinued” all of my medications. I told them they could not discontinue a medicine they did not prescribe. She told me I could “take it up with the doctor in the morning.” I told her “no you don’t understand, I have to have the medicine to control my heart rate and my blood pressure.” She told me she didn’t care and that I could take it up with the doctor in the morning.

I begged and pleaded for them to let me have my blood pressure and diabetes medicine, they all told me they didn’t care. I told them I was going to leave to go get my medicine, if they would not give it to me and that they couldn’t just hold me hostage and not allow me to have the medicine I need to live. They told both my husband and I that we were not “allowed” to leave the room, or we would be “arrested.” When we asked, “arrested for what exactly??,” they had no answers. I told them I wanted to speak with the medical director of the facility to complain. An hour or two later, some supervisor nurse named Antonio came in and asked me what I wanted. I felt so dizzy and drugged from all the other drugs they were giving me; I could just barely talk to him. I told him I needed to take my blood pressure and diabetes medicine or that I was going to get very sick. He told me they said I had “refused” to sign any medical releases to see what medicines I take. I told him that was not true, and that no one ever asked me to sign any release. He told me that because it was late at night on a Friday, that they would not be able to get in touch with anyone to see what medicines I “actually” take until Monday morning. I told him I had to take my medicine before that and that they couldn’t force me to go three days without taking at least the beta-blocker I have to have to live! He said he couldn’t help me with that, and that he could only make a record of my complaint. Then he left. My blood pressure continued to get higher and higher. I told the nurses that I was having severe headaches, nausea, my heart was racing and that I was having trouble breathing. I started getting really sick and vomiting.



My hematocrit was extremely low, and my blood pressure and sugar levels were very high. The nurse named Carmella told me I was “faking it” and that I was just “doing it to get attention.” She and another nurse started laughing and mocking me. My husband asked them to explain how my blood pressure and heart rate were extremely elevated. They said I was “just working myself up on purpose to “artificially make them high.” I remember as I was trying to hold my daughter Sofia, I was shaking so badly I had to rest her on my chest so as not to disturb her. My husband kept offering to hold her, but I wanted to spend every moment with her that I possibly could because they kept telling me that they were not going to allow us to take her home. As I was holding my daughter and crying from all the emotional and physical stress I was going through, my evening nurse named Cindy kept coming in and asking me about Peter, my husband. He was asleep at this point and she kept asking me what he was running and hiding from and who was he really? I told her that he really was my husband and that we were not “running from anything or anyone.” She continued to harass me saying that if she had a daughter who came home with some “Saudi Arabian Muslim guy” who was “running from the law,” that she would disown that daughter and never let her in the house again.” She told me that as far as she was concerned, an “A-RAB” was no better than a “Mexican behind a wall” and that in her opinion and the “opinion of the other hospital staff,” that I needed to just “turn him in” for whatever he is “running from the law for.” Then she asked if he was really the father of my other children and if we really did have custody of them. I told her yes and then asked her to please leave my room. She eventually left but continued to come back in and kept taking my infant from me while I was trying to nurse her, making up different excuses each time, but mainly kept telling me that she was “too tired to nurse.” I asked her to please stop harassing me and leave me to bond with my child, but she refused.

She lied about the sugar readings on my daughter citing that they were much lower than they actually were, my husband and I both saw what the readings actually were. This nurse was intentionally lying to make our daughters sugar levels appear lower than they really were so that the practitioner could justify taking our child from our room without our consent! The nurse practitioner for the evening came in and said he was taking the baby to the nursery to get an IV glucose drip due to her low readings. I asked him if we could be allowed to feed her formula every hour instead of every three hours to see if it would bring up her glucose and he agreed we could try that and said that if her sugar hadn’t come up in the next three hours, that he would need to insert the IV. The next three readings were all in the 50’s, but when the nurse took the last one, my husband and I both saw the reading said 51, but she reported it as 49 and said she needed to take the baby to get the IV now. We started arguing with her that that wasn’t the reading and that it had said 51. We asked her to take the reading again and she refused. She said she was taking the baby and if we wanted, we could complain to the supervisor. So, I again had to ask to complain. My blood pressure and heart rate by now were very high and I was feeling very short of breath and lightheaded. As I was crying and trying to complain to this same jerk of a supervisor who already told me earlier that he didn’t care, Cindy came in the room shouting that if I am going to complain about her, that she has the right to know why!! I asked her to please leave several times and she just kept shouting at me. Finally, she said something like “well you better watch it honey, because I am the one who will be watching your baby in the nursery tonight!” (We have a recording of this) After she said that, I begged and begged them not to let her stay in the nursery with Sofia but they said she would not be the only one in there with our baby and that she was the only one “qualified” to watch a baby in the “special nursery” that night. The nurse practitioner gave us “permission” to leave the room only to accompany Sofia to the nursery but because my blood pressure was very high and I was in a lot of pain, I was not able to go so my husband went with our daughter to the nursery to be with her while her IV was being placed. After he got back, I was crying about how we had been treated and that my heart rate by then was nearly 200 and



my blood pressure was 180/120. (they lied about how high it was in the medical records) After I continued to complain about it and as it continued to climb, they finally gave me my beta blocker but still refused to give me my diabetes medicine. After that Peter and I were exhausted, and both slept for around 8 hours straight. The next morning when we awoke, my blood sugar was also very high, and they finally gave me the Metformin I was prescribed by my general practitioner. Then a neonatologist named Dr. Gork came in our room and started telling us that he “knew” we did not care about our baby because if we did, we would have been in the nursery for every feeding and that if he wanted to, he could have us prosecuted for neglecting her just because we didn’t show up for 2 of her feedings!! We explained to him everything that had happened and that I was made to go the entire previous day without any of my medications, that I had been in excruciating pain and that we were both exhausted and just needed some sleep. He said he didn’t care and that we “should have been there.” We asked him isn’t the nursery there to give the parents some rest? He said no, that this was a “baby friendly hospital” and that we, as the parents were supposed to do all the feedings. We told him that we didn’t send our daughter there willingly, that they had taken her from us saying that she needed an IV. He changed the subject and started saying that he “knew” we did not even have custody of our other children and that we would not be allowed to keep Sofia anyway so there was no need for us to see her anymore. I started crying as Peter was telling him it wasn’t true, that we do have custody of our other children. He refused to tell us who told him that we didn’t have custody of our other children but he did say that he had spoken to my OB-GYN in Nashville (and that he was well within his right to do so because it concerned our daughters “safety” even though it was without my consent therefore violating my HIPPA rights!) who agreed with him that we are “bad people and should not get to keep our child!” I told him I left that doctors practice because I felt like he was sexually harassing me and that anything negative he said about us was in retaliation. Dr. Gork said he “did not care” and that he was in complete control of our daughter and said he didn’t HAVE to allow us to see her. We begged and pleaded with him to please let us see our baby. He told us that we would be allowed to see her only for feedings and that if we missed even one more single feeding, that we would not be allowed to see her anymore. He told us that the DCF would be there to take custody of her on Tuesday and that he was going to testify against us about how we “neglected” her by sleeping during her scheduled feeding times and about how I “refused” to sign a medical release for my prenatal records. I told him that wasn’t true and that I never refused to sign anything. I asked him if I signed the medical releases and we make her an appointment with a pediatrician in CT, would we be allowed to keep our daughter and take her home? He laughed and said no, that if we thought we would be going home with our daughter, we were dead wrong and that we would not be going home with her “for a very long time, if EVER.” We told him that the nurse practitioner had told us that she would be ready to come off the IV and come back to our room by the end of that day and asked him if they would at least send her to our room so we could bond with her and take pictures. He said “no, I think finding her “permanency” is a little more important than your pictures!” I had no idea what he meant by “permanency” at the time. He told us we were obviously some kind of “criminals” and that we obviously didn’t care about any of our children otherwise we would just “turn ourselves in!” We told him we were not any kind of criminals; we have nothing to turn ourselves in for and that we loved all of our children very much and that our whole world revolved around our children. I showed him pictures of our family on my phone and told him how I had always wanted a baby girl and how hard we had tried to get pregnant with her. We cried and begged and pleaded with him to let us keep our baby. He told us that the DCF was definitely going to take her on Tuesday (since they were supposed to be closed on Monday due to a holiday) but that we would be allowed to stay at the hospital with her and feed her and that the hospital would “board” us there free of charge as long as we didn’t miss any feedings and left the room. The next feeding, we went to was the first time we had seen her in several hours which seemed like an



eternity, and I just held her and cried and cried. I must have sat there and cried for like 20 minutes straight. My husband just put his arms around us, and we just held her and wept together. It was such a spiritual moment and we prayed for her that God would keep our poor sweet daughter safe. Our rejoicing was short-lived though, as many of the nursery nurses were so hateful to us, they made it very difficult for us to enjoy what little time we were allowed to be with our daughter. I had to complain several times about how the nursery nurses kept harassing us while we were trying to spend time with our little Sofia. They refused to give us any privacy and kept hovering around us telling us that we were not feeding her right or holding her right or changing her the right way. One nurse named Golda kept trying to take the baby from me, telling my husband and I that we just looked too tired to be there with her and that we should just go back to our room to get some rest. Another time she told my husband that there is a law in CT that we would not be prosecuted if we wanted to just "give her up" within so many first days of her life. We were both so shocked at what she was saying, we just looked at each other with our mouths wide open. We told her we loved our baby and would never dream of giving her up!! Then she kept talking to me about how dark our daughter's hair was and that she "looked more like a Chinese baby" than anything else and would I even want her if she looked nothing like me? I told her that I loved my daughter, that I didn't care what she looked like and asked her to "please leave us alone!" We complained to our nurse about the things she said, but no one seemed to care as usual. Then when we saw her again later, she started shouting at me that I "had no right to complain about her!" It was a very tumultuous day constantly having to fight with these combative nursery nurses. The hospital wrote so many lies in their medical reports. They claimed that we obviously did not care about our newborn and that we even stated that we "did not care to bond with her." They said that we did not even see her for the "first 30 hours of her life" and that we had to be "forced" to go see our baby. Then they said that when we eventually did go see her that I (as her mother) could not even figure out how to change her diaper and had to be taught how to change a diaper by the hospital staff. As if it's not obvious that it would have been impossible for me to have already had two children and somehow gotten by without ever having changed either of my children's diapers, there are about 100 people that I can call to vouch for me that I started babysitting with my sister when I was 13 years old and babysat tons of children during my high school and college years. Then Sarah Lennon wrote in the hospital records that we were obviously a "flight risk" and claimed that my husband wrapped our daughter in his jacket and tried to somehow smuggle her out of the building.

None of those things ever happened. They are blatant lies written by extremely racist, prejudice, ignorant people to justify holding us against our will. She even admitted in the report that they held us in the hospital against our will before our baby was born and forced the C-section on me. She and the other hospital staff believed we were criminal running from the law because we are a biracial couple and she believed we were a flight risk. I have the right to birth my child however I wish and no matter what their opinion was, we had the right to be allowed to leave that hospital and get a second opinion. We were detained against our will and our newborn child was forcibly taken from us based on their own lies. They violated our civil right and the rights of our child and alienated us from our only daughter for the entire first two years of her life.

First of all, at the hospital nursery itself that our baby was being held in was a locked room and we had to be buzzed in. She was the only baby in there and we never even had one second of privacy, not even while I was trying to nurse. Secondly, if we didn't care about her as they said, why would we be trying to "smuggle" her out of the building? Thirdly, the maternity ward itself was a locked ward, and we were not even allowed to walk in the hallway outside our room. Once I was trying to do some walking in the hallways because my blood pressure had been very high, leading my legs to swell badly, and they were hurting me a lot. We thought it was like any other hospital where they tell you to walk up and down the



hallways to get your blood pumping to avoid having a blood clot after having surgery. That was not the case here. They called the security guards and had them escort me back to my room telling me "I had better stay put if I knew what was good for me!" They told me I was only allowed to leave the room to go to Sofia's "scheduled feedings" and that the rest of the time I was "not allowed to leave the room!" I told them they could not hold me as a prisoner inside my hospital room and that I had not done anything wrong! The nurses told me that if I tried to leave my room again unsupervised, during a time which was not a scheduled visit with my daughter, that they were going to "kick me out of the hospital" and have me discharged with no pain medicine and that they were going to have our daughter adopted by a loving family that was "obviously more deserving of her than we were!" We were absolutely terrified from the way they treated us! I have never been so terrified in my whole life. Peter and I both still have nightmares and flashbacks until this day. I felt like we were living in some kind of horrible nightmare and kept praying that I would wake up, but things only went from bad to worse. Even though we were exhausted, and I was in terrible pain, we didn't miss another single scheduled feeding for our daughter that last full day we had at the hospital with her. That evening (Sunday evening) they told us they were going to bathe Sofia and that we could be "allowed to watch." We fought very hard with them and finally they agreed to let me bathe my daughter myself and we took a video of her first bath. Then one of the times we came back from feeding our baby, our room had been completely ransacked. All of our belongings had obviously been searched through and some of our important personal documents were missing (containing copies of our drivers' licenses, social security numbers, and other personal information). We complained to the same uncaring, rude supervisor again. (We have a recording of the complaint) He didn't care and tried to pretend as if the nurse had just been in the middle of "cleaning" our room. It was so scary the way they were treating us, and no one seemed to care. Peter's family members had come to the hospital from New Jersey twice to visit us and see the baby. They would not allow him in and said that we were not there.

On The morning that they took our daughter (it was Monday morning, not Tuesday), a nurse came in 8:00 am and told us we needed to get up and go to the nursery because our daughter needed to be fed. We asked them why would she need to be fed since she was on a 3,6,9,12 feeding schedule, and we had just recently returned to our room and gotten back to sleep from her 6 am feed? The nurse snapped at me "because she's hungry and you NEED to go feed her now!" So, we got up and got dressed and went to the nursery. She had been doing really well with her breastfeeding the day before so like always I let her feed from my breast before attempting the bottle. I noticed the nurse named Laura Pittari glaring at us from across the room. I was trying to ignore her, and I asked Peter to move the small privacy curtain closer to me to block my view of her staring at me. As he was moving the curtain, I heard her say to another nurse next to her that I was such a "disgusting drug addict" and that I should not even "be allowed to breastfeed the baby." That memory is burned so deep into my brain and perhaps one of the most hurtful because it was the last time I was ever allowed to breastfeed my daughter. Sometime later a pediatrician named Dr. O'Callahan came in and talked with us as I was breastfeeding Sofia. We spoke with him for about an hour about our life and our time in medical school in the Caribbean and our other two children. He told us that he would be the one taking care of Sofia while she was there in CT in DCF custody. He was one of the only hospital staff who seemed genuinely nice to us and he gave us hope that we would see our daughter again but he did not, however, mention anything in our defense in the reports about the fact that they had no right to kidnap our child claiming "predictive neglect" when it was clear that we had done nothing wrong. The statute is "imminent threat of harm" and neither I nor the baby tested positive for drugs and I was cleared by 3 different Psychiatrists as being "clinically sane and no threat to myself or others," yet



they still held us against our will long enough to take our child from us to give to their court clerk friend to adopt.

Shortly after he left, a social worker came in and told us that the DCF were there to take the baby. I asked her why and told her that we were told the DCF would be back on Tuesday. She said no and that they decided to come today even though it was "after hours." I asked her if we could just have a few minutes to take a shower because we had been up all night. She told us "no, that the DCF worker was very busy and because she was there as an "after hours" situation because the worker was "supposed to be off that day" because it was a holiday, she wanted to go ahead and get this "over with." We both gave Sofia a gentle kiss and laid her down in her little crib. It was the last time we would see her for nearly a month. As I was weeping on my way back to our room, I could barely see through my tears to make it down the hallway. Once we were back at our room, I went ahead and got in the shower. I didn't care what they wanted anymore. I was tired of being bullied and accused of all kinds of terrible things just so they could justify stealing our baby from us. What they were doing to us didn't seem legal. It didn't seem real, yet they were overpowering us just the same and we were seemingly helpless to stop them. After I got out of the shower, a woman named Brenda (who refused to show us her ID and said she didn't have a card) came into the room and told us that she was taking our daughter on a 96 hour hold because we were being "uncooperative." Again, we told her that we would get a pediatrician's appointment in CT and pay out of pocket for it if necessary. We begged and pleaded with her not to take our baby. She said she was taking the baby and now we could leave. I told her I wasn't leaving and that we were told that we would be allowed to stay at the hospital to feed our baby until they were able to review my medical records so we could have our baby back. I also told her I wasn't even scheduled to be discharged until Tuesday anyway. She said no, and that we were not allowed to see or feed our daughter anymore and that we needed to "leave." I again told her I wasn't going to leave my baby and that she did not have the power to kick me out of the hospital. She left and shortly before she came back, we overheard her threatening the doctor in the hallway and then told her that she had better "get us to leave." Even though I had lost so much blood, I was severely anemic and my hematocrit was only 23 % (at 22% you have to have a blood transfusion or your life could seriously be in jeopardy), the doctor came in and told me that I needed to leave and since they were not allowing me to see my daughter anyway, there was really no reason for me to stay. I told her that I wasn't scheduled to be discharged until the next day and she couldn't force me to leave. I told her I wanted to stay to at least pump breastmilk for my baby so she could receive the antibodies she needed to stay healthy. She finally agreed and told me I was not allowed to leave my room for any reason. I agreed. Then the worker named Brenda started shouting that if she was going to let me stay, then they have to make my husband leave because technically he was "just a visitor." I interrupted her and told her that since she did not work at the hospital, she was not allowed to tell me what visitors I was allowed to have. The doctor looked terrified of her but didn't say anything else and left. Brenda came over to us and told us they would be taking our daughter from the hospital and putting her immediately into foster care since we would not leave and told us they would be feeding her Similac. We asked her to please give Sofia Similac Sensitive since our first two children had severe gas issues. Just before she left, she came over very close to my husband and I and whispered that she could literally take our daughter anywhere and do anything she wanted with her because she has "that much power." After she left Peter and I just held each other and cried. Later we found out that she also made all kinds of claims that I had a paper bag of pills with me, that we refused to cooperate, none of it was true. After we left the hospital, we went out and bought a \$200 breast pump and stayed in CT for another week at various hotels (costing us nearly \$1000) keeping up my milk and looking for an attorney we could afford and waiting for the 96 hours to end, believing that no judge would possibly agree with what they were doing to us and our baby. It was



simply not the case in CT and the judge readily agreed to anything they asked for, just taking their word for it that we were drug addicts and Muslim terrorists even though my tox screens were all negative and my husband and I are both Christian! Since then we have given these DCF people everything they asked for and they are still refusing to give us our daughter back or even place her with our family. They have made all kinds of derogatory claims about us, none of which are true and told us that we had to "prove them wrong" in order to get our baby back. They said we had to go to parenting classes. We asked them many times to enroll us in whatever class they wanted and that we would gladly attend, but they never have. We eventually enrolled ourselves in classes at our own expense, and the Judge literally refused to hear any of our evidence. Then they told us we had to prove that we were not gypsies living out of our car, we sent them a copy of the lease at the house we were renting. Then they called up, lobbied and harassed our landlord and got them to kick us out. They asked us to "vacate" by the end of that month and then we had to spend tons of time and thousands of dollars moving our family and all of our furniture from the 2000 square foot house into another home. As it turned out, the foster mother they gave our daughter to was a court clerk in the very same court system in Middletown, Connecticut and we have proof that she is in fact the judge's niece!

These DCF have consistently ignored our daughter's health and refused to let me nurse her or give her my breastmilk that I had pumped. We then begged them to give her Similac sensitive and they refused, leading her to have to suffer with severe gas for the first 2 months of her life. She would make these horrible gulping noises when trying to feed and would scream out in pain. We asked the foster mom to use vented baby bottles and we even bought a very nice \$40 set of pink Avent bottles just like the ones we used for our first two children (she was using cheap unvented bottles she got free from the state). We asked the pediatrician (at the one visit we were allowed to attend in her nearly 5 months of life) if we could give her these to use and she and the case worker argued that she shouldn't have to use those bottles for our daughter because she would have to buy more and that they were "too expensive." When the doctor told her that our bottles really were better, she made up some story about how she also had some Dr. Brown bottles at home that she also used even though the case worker had already told us those were the only bottles she had which is why we bought the Avent ones in the first place. The case worker (named David Friend) later admitted that he had never actually seen the Dr. Brown bottles in question. The foster mother was really hateful to myself and my husband and kept rolling her eyes as I was holding and kissing my daughter. When we asked the doctor to please switch our baby to sensitive formula, he agreed but the foster mother said she would not be able to give our baby the new formula until the next week because that's when the WIC office would be open so she could get some "new coupons for the new formula." In the middle of the doctor's visit (which we have recorded), after the case worker realized we had already met this pediatrician at the hospital and the doctor was treating us very amicably, he pulled Dr. O'Callahan into the hallway and we overheard him threatening this doctor that he was not to help us, agree with us or testify for us in any way. He further said that the DCF gets his practice a lot of business and threatened that they could send their patients else wear and mentioned that they might be willing to help fund the doctor's upcoming "trip to Africa." After they came back in, the doctor refused to even look at me or my husband. While looking at the floor, he just told us it was nice to see us again. After convincing the foster mom to keep the bottles we had bought for our baby at least as "travel bottles," he left and so did we. As we were walking down the hall to leave, we rushed back down to the room to give the foster mom the bottle brush we had purchased with the bottles and had forgotten to give her. We stopped just before we got to the room because we heard her crying. She was telling the case worker that because "the pediatrician likes that drug addict girl, now he is going to testify for them" and that the "adoption was not going to go though." The case worker started comforting her telling her that



“no one was going to testify for them” and said, “we will make sure of that.” She went on to tell him that since I was a “drug addict” and they my husband was an “illegal immigrant,” it was clear that we “do not deserve to raise Sofia” and also said “Sofia deserves better than them.” She then started asking him if they were going to be able to “expedite the adoption” and that’s when my husband took my hand and pulled me into the exam room. They both just went white and stared at us wide-eyed as if caught in the headlights. As we walked in, I looked down at my sweet baby daughter sleeping so sound in her car seat, completely unaware of the atrocities being committed around her. I remember in that moment, recalling to myself all the times she used to kick me from within, and I would give her a gentle nudge on my belly and tell her how much her Mommy loved her. I wished so badly that I could just take her and run. She was my gift from God; the little girl I had always dreamed of having, now in the clutches of a hateful, middle-aged entitled woman that looked up at me with such a hatred I don’t believe I have ever seen before. She just stared at me with her cold, callous eyes and I just wondered how she could be so cruel to deliberately lie and abuse her power as a court clerk try to steal another woman’s baby from her. Then, after I was able to muster up enough courage, I handed her the bottle brush, thanked her for taking care of our baby and we left. It was the hardest thing I have ever done in my life.

It has been an uphill battle with the case worker and his supervisor. All they have ever done is lie about us in their reports and lie directly to us about everything. They refuse to tell us about our case, so we never know what is going on! Until our daughter was over a year old, they blatantly refused to tell us what the allegations against us were and what exactly we were on trial for in the first place!!! They have been extremely hateful to us and have lied to us on many occasions (that we have on recording). We were complaining to the supervisor how the case worker had not been truthful to us about how to get my husband’s name put on our daughters birth certificate (because the hospital staff refused to let us do so saying they wanted to see a copy of our marriage certificate), she told us that the DCF has “custody” of our baby’s birth certificate and that we were not allowed to alter it in any way. Later that same day when we were talking with the case worker and his supervisor, he said no that wasn’t true and as they were walking out of the room, he asked her why she had said that, and she whispered to him that “it’s easier to strip one parent of rights than 2.” She made several extremely racially derogatory comments to myself and my husband and attacked the validity of our marriage and asked us why, would two people as different as us even be married in the first place, as if it is any of her business. Then she said that if it is the case that we “really are married” that I most likely had only married him just so he could be a “citizen in the U.S.” even though he has been a U.S. citizen since he was a small child. It was just ridiculous, how she would literally just attack any and everything we would say. She also said she “knew that we were lying” and that “we never intended to go to Maine.” She said that she was “from Maine and knew everything about it” and that’s how she knew we were “big liars.” We looked her up online and found her social profile and credit reports, and it said she has “lived in Connecticut all her life” and she has never LIVED IN Maine!!!! (we still have the documentation!)

Since our child was taken from us at birth, we were only allowed to see her for 2 hours at a time, in a 10ft x 12ft room with a broken rocking chair, filthy furniture that smelled of some old musty perfume. Even though we already had two other healthy children in Tennessee, we had to be “supervised” during the visit. Before my husband had to go back to work, we stayed in New Jersey with family for as long as we could to be as close to Sofia as possible. We made the 3-hour commute at first every day, and then later on just Mondays and Wednesdays. On the Wednesday visits we were supervised by an extremely hateful, racist woman named Barbara. She (and even David in the beginning even though he admitted it was obvious that “we did love our baby”) would sit there and badger and harass us during the entire 2 hours we were allotted to spend with our only daughter. No matter how we held her or fed her, no matter how



we bounced her or burped her, she would constantly harass about how every single thing we did was wrong. It made it nearly impossible for us to enjoy our visits with the little girl we worked so hard to have.

The first December after she was taken, we were not allowed to see our daughter for the Christmas holidays and after emailing and calling several people, no one replied to us to let us know how she was doing. During the "Case plan" meeting, the case workers supervisor kept insulting me saying that I didn't even care about my daughter because if I did then why didn't I contact her. When I told her I didn't want to have to speak with her because she had been so hateful to me and had lied to me in the past, she started screaming and shouting that I was "attacking her." We begged her to tell us what exactly the accusations against us were and asked what we were supposed to do to get our baby back. She flat out refused to tell us. Then she started trying to con us into taking our other two children into the state of CT, saying that it looked really bad on our part that we haven't brought our little boys to see their sister. We told her we desperately wanted to bring our other children to see their sister but were told not to by many others saying that if we were ever to take our other children into the state of CT, then they would legally be able to steal them from us as well (not because we have ever neglected or abused them in any way) but merely based on the fact that they had already taken our daughter. We asked them if that was true, and they all just turned white and starred at each other. Again, I asked the same question and she hesitated and then finally replied "well no, not necessarily." I told her I didn't believe her. Later she started calling me hateful derogatory names saying that I was a "paranoid control freak" for not believing her even though I have recordings of her openly lying to me in the past! They started saying they really need us to bring our children into the state of CT because they really need to "check their health" because they "discredit" the reports from our pediatrician and wellness checks from the detectives sent to our house in Tennessee. Then she smirked and whispered to the mediator "those little hillbillies in TN wouldn't even know what to look for in a wellness check." (The "mediator" woman was no mediator at all, she was clearly a very bias party as she cut myself and my husband off on several occasions while we were trying to tell our side of the story regarding various issues. Then she let David's supervisor cut her off several times just to scream some more at us. A couple different times, it would look like her screaming fits were done and the mediator would again begin to speak, and then the supervisor woman Marie would continue to scream at us some more. It was insane, and the more she kept screaming and shouting, it was obvious that everyone in the room was clearly afraid of this especially the Mediator, David and even our own attorney) I just told her I would NEVER be taking my children into the state of CT. Then they said they intended to send our (then 8-week-old) daughter to daycare. I told them they couldn't as I didn't think she was old enough yet. For a brief moment in all of the shouting, I couldn't remember how long it had been since they took our daughter from us because everything since had been such a blur. That's when Marie, the supervisor, started mocking me, saying that I was unable to even do simple math! We just starred at her with our mouths open, it was just truly shocking how completely cruel and ruthless she was. We begged and begged and begged them not to send her to daycare citing that she had not been breastfeed and that she could potentially catch some terrible illness. The supervisor woman (her full name is Marie Greco Levesque) simply told us that our concerns were of no concern to her. We continued to beg them not to send her to daycare and rather to place her with our family members. They told us that sending her for placement out of state would take months and that the foster parents were insisting that they needed to send our daughter to day care because that is what was "most convenient for them" so that's what they intended to do. Later after the case plan meeting David, the case worker took my husband and myself into a different room and asked us to sign some "referrals" for us to go to parenting classes. We agreed and as he was handing us the two different sheets for us to sign, he was telling us that we are really "two very



different people” and that most likely it is the case that “only one of us will be cleared as “safe” for the baby to go home with.” I told him that I didn’t understand, what would that mean for the other person since we are married, have two other children and live in the same house? He just said “well, I don’t want to confuse you, so we’ll just talk about that later.” (We looked it up on the internet and it said that all the time, the DCF will tell parents the ONLY WAY to get their child back is to divorce their spouse, then at least one of them can have their child back and thus be able to keep them out of foster care. Then later on, they say that because you are divorced and you have a broken home, you’re not a fit parent and use that in and of itself to never give you your child back!) We then told him that we wanted to bring our relatives to see our daughter. He just bluntly told us “no.” He said that the “visitation was only for parents.” We begged him saying “please our family wants to see our daughter.” Again, he just said “no.” Later in the “case plan report” every single thing they wrote regarding their observations of us interacting with our child were extremely negative and were all completely false! They wrote all of these lies saying that we “refused to bring our family to see our daughter, we didn’t care about her, we were terrible parents and that we couldn’t even feed her or hold her or change her the right way.” They didn’t say anything at all about how much we obviously loved her, cared for her, held her, cried for her, laughed with her, took pictures with her and dressed her into all the smocked baby dresses (we have had for her since our first child was born.)

After being in daycare for two weeks at such a young age, our poor little Sofia caught Respiratory Syncytial Virus (RSV) and nearly died. She had to be taken to the hospital with a 104 fever and she would scream in pain as her airway passages had to be periodically suctioned. Her chest was rattling so loud, I have never heard such a rasping noise come from such a small infant. It sounded like a vacuum cleaner just listening to her breathe. We didn’t even know until the hospital called us one night asking for consent to treat her, but even then, they refused to tell us what they needed to treat her for. Eventually one male nurse admitted to us (and we have this on recording) that the foster family knew she was having really bad breathing problems and other symptoms and waited a whole week before they brought her to the hospital to be treated. He also said that the hospital did provide the family with Dr. Brown bottles free of charge thereby proving that she did not have any vented bottles before that. During the several days Sofia spent at the hospital, we were only allowed one 2-hour visit to see her. I think I cried the entire 2 hours. This time, we brought Peter’s father and our Orthodox priest to baptize our child and told David we were going to heavily complain if he did not allow them in. At the beginning of the visit, the case aide named Barbara said she needed to take down their names. Peter’s fathers name is Tharwat and she kept laughing at the spelling of his name loudly, as I was holding my very sick baby, saying she “just couldn’t spell his name because it didn’t make any sense. He was trying to be very patient with her and told her how to spell it like 10 times. Then she asked the priest for his name. Even though he is called Abuna Antony, his real first name is actually Magged which is the name he gave her. She started laughing loudly again saying “did you say your name is Maggot?!” and continued laughing. It was extremely racist, unprofessional, disrespectful and embarrassing, that she would act such a way to a holy person there to baptize our sick child just because he was Egyptian and not white. Then after our daughter was discharged from the hospital, we again begged them not to send her back to daycare since her immune system was now depleted and she would be more prone to illness. They told us they didn’t care what we wanted and that the doctors there had approved her to go back to daycare the following week even though they admitted she would have residual chest rattling, severe coughing and would be at a higher risk of catching pneumonia. Several weeks later in our visits we could see that her condition was not improving as readily as the doctors had said because she was still very sick and congested every time we would see her so we asked the foster parents about taking her back to the doctor in the journal (which we had



requested weeks before and they sometimes send it with her to our visits) It wasn't until after that that they said they were going to give her steroid breathing treatments 4 times per day. They refused to even take her back to the doctor until we complained because they cared so little about her health.

For months, every time we got to see her, she was sick with respiratory illnesses, diarrhea, and terrible diaper rashes. Since he knew that I personally have asthma, he told the pediatrician that all of her congestion and breathing problems "run in the family" and that it has nothing to do with the fact that she was still very sick and recovering from her terrible case of RSV and constantly catching more illnesses at daycare. I asked him if he could please ask the daycare teachers to take notes about our daughter during the day, about her activities and how she was doing everyday so that we could feel more informed about her life. He said no, he can't do that because it is just a waste of his time and that they would probably just write "a bunch of generic stuff about when she eats and gets her diaper changed." Then he wrote all of these lies about how we did not care about our daughter, never asked about how she was doing or her welfare, and that we never made any attempts to be a part of her life in any way.

Every time we saw our baby, she had multiple skin rashes and ambiguous bruises and scratches that we would bring to his attention, and he pretty much ignored all of our concerns. For over a year, she suffered from severe gas and would constantly let out gas and scream in pain. We begged the case worker to let her have Mylicon baby tummy drops to coat her stomach. We told him they were just over the counter and that they worked wonders for our other two children. He simply told us that we were not allowed to just "play doctor and give her "whatever kind of drugs we want" and that "Mylicon drops might be too expensive for the foster family." He kept telling us he would ask at her next doctor visit if the doctor would allow it, but at each consecutive visit (which we weren't allowed to attend), he never did ask. This shows that the CT DCF were not acting in the best interest of our daughter, but rather just did whatever was "most convenient for the foster family." This foster mother they have her with was a court clerk and was just abusing her power and lying about us to keep our daughter in her custody. She never spent any of the stipend money she received for our child actually on our daughter. Instead, she used supplies that she got for free from the state and made our precious little girl wear used baby clothes when we had a whole room for her at our house of new toys and clothes that we spent thousands of dollars on before she was born, just for her. All those months that I spent being completely miserable, violently ill vomiting every day, being in terrible pain not being able to urinate because of my retroverted incarcerated uterus, being completely miserable having to deal with all the pain and my blood pressure and sugar issues, and suffering from such anemia, I barely had the energy for much of anything. The one thing I could find comfort in was buying pretty new things for the sweet baby girl I had always dreamed of having. It just makes me sick how little they ever actually cared about this little person who means the whole world to her real family. She was nothing but a means of income to them. Several of the car seats they used for her were expired (and we have pictures to prove it.) In addition to the free healthcare, free childcare, free diapers, free wipes, free formula and free baby supplies they get from the state, the "foster family" also got paid \$2000/month to hold our daughter as their legal hostage. These people never cared about her in any way, they were just exploiting her as an extra income and nothing more. If they had cared about our child, they would not have kept insisting on sending her back to daycare just two days after they nearly killed her with RSV. Then the case worker was insisting that we apply for our daughter a social security number so that the foster family could write our daughter off on their taxes!

We did not do anything to deserve the way we have been treated. We have never neglected or abused any of our children in any way. We love our children and take very good care of them. Neither of them has ever even been sick with anything more than a common cold. They never had any proof of any of the lies



they wrote about us in their reports. Even though they hadn't yet won a judgement against us in 2019 (our court date was in June) they went ahead and set another court date for November to terminate our parental rights to the precious little girl we have always wanted. The hospital, full of racist, prejudice staff who refused to let us leave and then cut my daughter out of my own body without my consent, did so just to kidnap her!! They never, ever intended to let us go home with our child. What they are did was not only wrong, but also illegal!! Not only have we never lived in the state of Connecticut and they have no jurisdiction, but they were profiling us from the very beginning saying that there was "absolutely no way a white woman like me would be with some "dark Arab guy" was if we were "some kind of criminals!" From the moment we walked in the door, they started accusing us of all kinds of terrible things. By the time we realized how terrible they were and that they were trying to hurt us, it was too late.

For months, they forced us to drive up to CT from Tennessee weekly to see our daughter (or else we would not get to see her at all) and refused to send her or our case back down to our home state even though legally, we have the right to have our case sent to TN according to a law called the Uniform Child Custody Jurisdiction and Enforcement Act. We even found a statute in their laws stating that a baby born to a mother who lived out of state would not fall under their jurisdiction. They still refuse to transfer our case and our daughter to TN saying their courts are "legally allowed" to ignore that law if they choose to, which is not true! Initially, before Peter had to go back to work for paternity leave, we were able to stay in New Jersey and commute the 3 hours each way daily to go and see her. Then when my husband went back to work and we started having to drive up from TN, we had to cut the visits to just once a week, since the trip is about a 40 hour drive, round trip we were only able to do it once a week and still be able to get Peter back in time to go to work. Then we were relegated to only getting to see our daughter once every other week, as we simply couldn't keep driving every week because the drive takes 2-3 days, was costing us hundreds of dollars for each trip and was leaving us zero free time to spend any family time with our other two children. On one of our visits in 2019, we showed up on time to the very minute (they kept telling us that if we don't show up within 5 minutes of our scheduled visit time, they are going to use it against us in court to say that we don't care about our child. We were on time for every single visit despite the fact that we had been driving for nearly 20 hours straight and we were completely sleep deprived and exhausted. They made us wait in the lobby for 2 additional hours to see our baby Sofia. We were so exhausted we could barely stay awake. Sofia was so sick and congested, she kept farting loudly and screaming in pain from her terrible gas. The case worker again told us that we were still not allowed to give her tummy drops for her gas and then wrote lies in his reports that we were "unable to soothe her because she had severe stranger anxiety and did not like us and did not want us to be her parents." She was only four months old at the time and did not have stranger anxiety but rather she was very sick and had severe gas.

Peter and I were made to suffer for months with severe depression, anxiety, and PTSD from being unlawfully separated from our only daughter. Because we hardly ever got to see her and were alienated from our child for so long, we had no idea how she liked to be held or rocked or put to sleep and it was just so very distressing not being able to soothe her or help her as much as we wanted to. We just wanted to be able to hold her and rock her and make everything all better but we could barely even enjoy our visits because we are always so exhausted from having to drive (over 1000 miles each way) for so long in a straight shot without sleep. We got to see her so little, it was like she barely even knew who we were. I felt like I was dying a little inside every day that we were without her and it's so unfair that we have barely ever even been given a chance to bond with the daughter we have always dreamed of having. It isn't fair to me, it isn't fair to her, it isn't fair to her father whom just she looks just like (except she has my eyes), it isn't fair to her two older brothers, who are the most incredible little people and it isn't fair to



the rest of both our families who have never even gotten to meet her, including my 95 year old grandmother, who desperately wants to meet her great- grand baby.

Sofia's father and I only ever wanted the simplest life. We both have worked so hard in college, grad school and then in medical school so that we could have nice jobs and a nice house to raise our children. I had all these life plans for our children of piano lessons and soccer games, violin concerts and ballet recitals, girl scout meetings and getting to eat all the left over cookies after Santa had left all the children their presents. I may be just a little white girl from the suburbs of Tennessee but just like anyone else, **I too have a dream.** A dream of equality and a dream of getting to raise my children with my Egyptian born husband without fear of persecution. I have a dream of getting to watch my children grow, getting to know them and who they are as individuals, helping them stand on their own two feet and doing all the things any normal person would want in life. I dream of getting to help them study for math tests and going to book fairs, getting to take them to their first dance, science fairs at school and summer vacations to Disney world. I dream of one day getting to see them graduate from high school and someday helping them achieve their own dreams in life. I dream of growing old with my husband, getting to make Christmas dinner for all my children and their families and sitting around the fireplace, opening presents and watching all the grandbabies play with their toys. I myself never had much family besides my sister and my parents. I didn't have any aunts or uncles and I didn't have any cousins. I had distant relatives, but it wasn't the same and sometimes during the holidays when we had no one to visit, it would get really lonely. I always wished I had more family, but it was something no one could ever give me. My mother started hemorrhaging shortly after she had me (just like her mother before her) and wasn't able to have any more children. I vowed to myself that when I got married and started having children, that I would do everything I could to give my children the big family that I never had. I vowed to give my children the gift of each other because it's the only thing I could give them that no one could ever give to me. It's the only thing that I could ever give them that I never had. Even though I have hypertension, diabetes, asthma, thyroid disease, PCOS and uterine fibroids, I took a break from medical school just to take off to have the time to have babies before it was too late because it is so important to me. Pregnancy was never easy for me; it was very painful and very hard, and I struggled with a lot of health issues. After I myself started hemorrhaging after my second child, I was terrified I wouldn't be able to have any more children. My husband and I decided to try at least once more as soon as I was able, for the little girl we have always dreamed of having. God finally granted our wishes, and our life was just so full of happiness. I was finally able to realize my dream of getting to play dress up with my little princess and a whole closet full of smocked baby dresses that I had had since before my first little boy was born.

I want to know, what right do these ignorant, racist, corrupt DCF up in Connecticut have, to steal our lives, our children and our dreams from us? What right do they have to rob my husband and I of our children and the family we have worked so hard to give them?! What right do they have to make us miserable and destroy our lives just because they work for the government and the law allows them to BULLY anyone they want and profit heavily from it?! It must be nice for people like them. They get to tuck their families into their worm cozy beds and sleep so sound and peaceful at night, knowing that no one will be at their doors when they wake up in the morning to steal their families and their children from them by force. No one will be there to hunt them down to pillage and plunder their lives. And while all of the super-rich people in America are paying hundreds of thousands and even millions of dollars to fake their kids records to cheat their way into ivy-league schools, the rest of us commoners down here in the real world are suffering and paying out all that we own, just to have the privilege of getting to keep our own children! We are having to pay thousands of dollars and all of our life savings just to fend off all kinds of ridiculous, erroneous accusations these horrible, corrupt DCF people make. As soon as you



prove them wrong, they start tossing out more allegations at you over and over until they have kept your children from you and held you up in court for so long, then they start saying that your children “need to be adopted out to other people because they need “permanency.” What they will never tell you is that the real reason they are stealing your children with the hopes of someday adopting them out to other people (whom they claim are “more deserving than you”) is because tearing your family from you and permanently separating your children from each other to “adopt them out” is making them rich beyond belief. Just look it up if you don’t believe me, how much the state makes off of stealing people’s children from them claiming neglect or abuse, and then putting them in foster care and adopting them out sometimes as few as 9 months after the process began. They refused to place our daughter with our family until she was nearly two years old. Before that, all they ever did was threaten us if we didn’t do whatever they wanted, that they would adopt our child out to the abusive foster family. This is exactly what is happening to us and everyone has told us (especially the people in Connecticut) that there is simply nothing we can do because there is no way to “win” against the DCF in Connecticut, and that we need to just accept our fate because “we are in the system now” and that there is no way out! They want me to accept the fact that they have stolen my only daughter after cutting her right out of my body against my will and kidnapping her! I will never accept that. There were several hospital staff who told us that she would really be “better off with a family of all one race so that she doesn’t get “confused,” when they were talking about how we could just “give her up if we wanted to.” A mixed-race person is who our daughter is; no one can change that, and it is certainly nothing to be ashamed of!!! They can lie and keep it from her, but her father and I believe it is a beautiful thing. It is something that we, as her parents, would teach her to be very proud of, to not judge people for the color of their skin but to love others and embrace them for who they are as individuals! It’s about being able to have differences with another person in culture, language, virtue, or otherwise and yet still encompassing a great respect and understanding for that person’s needs and beliefs and feelings as a human being. They want us to just accept the fate they have paved for us through their corruption and greed and racism saying that because my husband and I are a mixed race couple, that we must have neglected our daughter somehow in the past and even if not, then they are pretty sure we will neglect her somehow in the future?! How is it Ok for them to profile us in this way? They want me to just accept the fact that they have just taken from me one of the only entities in this world that is worth more to me than the air that I breathe?! She, along with our now three other children and my husband, are all more valuable to me than then my own life. I will never accept it. I will never be happy; I will never be whole, and I will never be free until she is home with us where she belongs.

When my husband and I were at Middlesex hospital, we were held in our room like prisoners until they took our newborn child from us and the DCF worker told us to “get out.” She started laughing at me as I was crying, begging her not to abduct my newborn child, and as my husband and I told her they would not get away with what they were doing to us, she said no one would believe us because I obviously “have mental health issues and that’s obviously why I was “screaming and crying hysterically” (even though I had already been evaluated by the psychologist at the hospital who said that I was fine, not to mention what descent mother wouldn’t be “screaming and crying hysterically” when told by strangers that they were stealing her newborn from her??!) After I collected myself and stopped crying and was trying to reason with her, she reported something like we were “cold and uncaring.” No matter what we did or what we said, they would find a way to twist it around and use it against us!! It doesn’t even make any sense and apparently, we are definitely not allowed to have any human emotions at all whatsoever. She then told us that she “knew” my husband was an illegal immigrant and that she would make sure he would be deported soon. (my husband has been a citizen in the U.S since he was a child) So just for the



record, in a matter of 4 days and on the basis of absolutely nothing, they went from accusing us of being “Muslim terrorists” to being “drug addicts/drug lords running from the law” and then claiming that one or both of us had “mental health issues.” In the following weeks they accused us of many more things, none of which were true. We are now haunted by those memories. My husband and I both have terrible nightmares and flashbacks about them torturing us and stealing our baby. Our life will never be the same. I wake up every day in my own home and open my eyes. I hug and kiss my husband as he leaves for work. I sit my little boys down at the table to feed them breakfast but as I look out the kitchen window, I realize I am still their prisoner. In my own home, in my own body, I still feel like their prisoner. We are forced to live in constant fear that we will never get our daughter back and that we will lose our other children as well. They made all of these claims about us that we “must be criminals” and we “must be terrorists,” but in reality, they are the criminals who unjustly stole our child and they are the ones terrorizing us.

Peter and I have never suffered so greatly psychologically, emotionally and physically than in these last 2 years we have been without our only daughter. We haven’t been allowed to see her in person in over 10 months. You will never know what it is to truly suffer until you lose your own flesh and blood child from your womb. We were never offered any kind of grief counseling or therapy, she was just gone, and we had to just deal with the stabbing, crushing pain of her loss every day. I miss her so much, some days it almost seems unbearable! Some days I am able to smile. I put on a happy face and make small talk with my husband. We laugh and play with our other two children and do our very best to enjoy what little we have left of our broken life together. I thank God every day for my husband and my boys and the love we share. I do my best most days to try to forget the terrible things we have recently been through surrounding Sofie’s birth as I find myself dreaming of what it would be like to once again be happy. I dream of growing old with my husband and watching our children grow up together. We had all these life plans of Girl Scout meetings and soccer meets, piano lessons and violin recitals, last minute school projects and summer vacations to Disney world. We worked so hard to build a life for our children and we worked so hard to have and take good care of our beloved babies. I didn’t have them for us so much as I had them for each other. I wanted them to be able to enjoy having the large family I never had. I was so sick after our second child’s birth; the recovery was so hard, and I was so afraid I might not be able to have another child. I was afraid I might not be able to have the little girl I have always dreamed of and we worked so hard to get pregnant with her. The pregnancy was so tough and so painful for me. I was so miserable and so sick all the time, I just kept thinking it would all be worth it once she was here in my arms. I would often dream of what it would be like getting to raise the daughter I worked so long and hard to have. Now it appears we may never have that chance because of the hatred, racism and corruption of staff at not only Middlesex hospital but also their affiliated branch of the Middletown CT DCF.

## **INJURIES:**

Our family has suffered immense, immeasurable physical and psychological pain and suffering at the hands of these very corrupt, racist, prejudice individuals who abuse their power to kidnap our daughter and destroy our lives for their own gain and profit.

The first attorney we paid thousands of dollars to refused to do anything beneficial for our case. He lied to us about our case and lied about us to the court on many occasions. He was verbally abusive and frequently called us derogatory names and after being mistreated by this horrible man many times we made it very clear not only to him, but also the DCF and to the court that we did not want him



representing us. The court clerk refused to take any documents we submitted to try to get rid of him and he flat out refused to withdraw. He purposely deceived us on many occasions and continuously intentionally tried to incite fighting between the two of us and also between us and DCF for his own amusement. He never told us what the allegations of us were or what we were ever on trial for and a few weeks before our supposed "trial" we sent him a revocation of power of attorney that he ignored and we strongly believe that he lied about us to the court saying we were "in jersey and refusing to come to court" out of retaliation, the day after the alleged trial when he told us the trial had been postponed to July. He knew very well we had never called from Peter's parents phone like he claimed to the court and we can prove it, not to mention he had just spoken to Peters dad who had told him that we had never made it to Jersey because of all the flooding in the northeast. He also told all of our prospective new attorneys derogatory things about us so they would not take our case out of retaliation.

My husband and I commuted several hours each way from New Jersey for months to see our daughter Sofia and then for several more months we commuted 20 hours each way from TN. We held her, kissed her, feed her, dressed her, changed her, and told her how much we loved her each and every time we took pictures and videos. Each and every time we were there to see her, she was always very sick and had severe gas. Even though it is over the counter and the foster parents were allowed to give it to her whenever they pleased, David Friend the case worker told us we were not allowed to give Sofia Mylicon drops to soothe her gas. Then he and his hateful, racist supervisors wrote false narratives about how we "didn't care about Sofia," "she didn't like us and didn't care about us," and that nothing we did with her was done "the right way." The racist DCF staff set us up to fail from the very beginning because they intended to adopt out our poor daughter to the Willimantic court clerk Maribelle DeJesus sparks from the very beginning. We overheard her asking the case worker about "expediting the adoption" when Sofia was only one month old. We were never given a fair chance to get our child back, never given credit for any of the efforts we made and never treated fairly. We were never even allowed to tell our side of the story or have any of our evidence heard. This is not a system of "child protection" but rather it is very obviously a system of "child kidnapping and human trafficking." I have heard hundreds of stories from other residents of CT, very similar to ours and the people of Connecticut should not have to face such terrors every day. It is wrong.

Our daughter was taken from us while I was drugged and recovering from major surgery and we were never told our rights. Not only do I still feel just as confused today and I was the day she was taken but also, I have a constitutional and fundamental right to parent the children I worked so hard to have. I have the right to birth my child how I choose and to choose my own mental health provider when the corrupt DCF were trying to claim that my husband and I were mentally unfit to raise our children. They refused to allow us to present evidence from our own independent provider even though it is the law and we have the right to complain about these abusive DCF staff who are merely abusing their power to keep our child from us. Hardened criminals have more rights than we have been afforded and we were even denied the right to have a trial because the judge was so biased against us. We do not feel that we have ever been treated fairly by the DCF or the Superior Court in Middletown, CT. We were never "homeless drug addicts, Muslim terrorists or criminals running from the law" as the hospital staff and DCF claimed and just because we are very upset that they violated our rights and have kidnapped our only daughter from us at birth certainly doesn't mean that either of us is or was ever mentally insane. They tried very hard to take our other children from us too and terminate our parental rights to our only daughter based on nothing but lies and inaccurate information asserted by very racist, prejudice individuals who profit heavily from adopting her out. We had over 50 notarized letters of recommendation from our friends and family, our church, and our pediatrician as well as 2 of the schools our oldest son has attended but their



biased court refused to see them or any of our other evidence that we are loving nurturing parents or allow us to have a “neglect trial” even though it would have been impossible for either of us to neglect Sofia while in the hospital under medical supervision. We humbly ask this court for a chance that our story be heard so that we can finally have a chance to have our side of the story to and justice be served for our daughter, our other children and our family. We believe our daughter has the right to know her real mother and father who love her very much and miss her dearly. We believe our daughter has the right to know her own parents, her own brothers, and her real family. We begged them to give us our daughter back or at least place our child with her family from the day they took her, but they refused. She was not placed with my husband’s family until a couple months before her second birthday. We and our other children are still not allowed to see her in person. My husband and I love our daughter very much, are more than capable of providing for her and just want her to come home. We just want justice for our family!

**Relief:**

They unlawfully cooperated to seize our biological daughter from the hospital at three days old with baseless, unreasonable, inaccurate claims of “predictive neglect.” They had no warrant and no exigent circumstances or any immediate threat of harm. They intentionally, deliberately lied in reports about us, our family, our other children, and our daughter whom they illegally took into their custody without any subject matter jurisdiction. They mocked us during interviews about our name, ethnicity, religious beliefs, and our biracial family as a whole. They took our daughter at three days old and placed her in a “pre-adoptive legal risk foster care home” because they never intended to treat us fairly or hear our evidence to get her placed back into our custody due to the fact that they intended to adopt her out from the day they took her. The foster Mother was their own friend and colleague who works at the courthouse as a court clerk in the very same court system that our child was taken in and is related to the Judge in our case. Instead of acting in our daughter’s best interest, they consistently just did whatever they believed would appease the foster family. They called us derogatory names and mocked us that we would never get our daughter back. Deliberately lied in their reports about us to keep us from our child, lied to TN authorities and tried to have them seize our older two children saying they believed our other children were in “imminent danger” when they knew it was not true. When the TN authorities refused to take our children from us because we had done nothing wrong, they tried to coerce us to bring our little boys to Connecticut so they could “assess them” themselves, when really they planned to kidnap our other children when/if we brought them with us. They berated us and told us that if we didn’t bring our other children, that was a clear indicator that we did not love our daughter and that they were going to request TPR. They refused to tell us what their accusations of us were for removing our newborn daughter from our care. They made racially derogatory comments and accusations that we must be “homeless drug addicts, Muslim terrorists and criminals running from the law” because we are a bi-racial. They refused to offer us assistance for travel to see our child until she was nearly a year old. They refused to offer us any “services” and lied claiming they we had refused to participate in their services. When none of their other claims about us panned out, they started making more baseless claims that we were both “mentally ill” and therefore unfit to parent our daughter even though they had zero proof of such and we already had 2 healthy children in our custody whom we have raised since birth. They used fear mongering to threaten and intimidate us in every situation and even threatened us with jailtime for contempt for asking to invoke our right to choose our own mental health provider. They regularly abused us and their power. Every little thing we said they would intentionally twist it around to manipulate the situation in their favor to



unlawfully keep our child in their custody. They tried to force us to plead guilty to “child neglect” claiming that they would not transfer our daughter or our case to our own state of TN unless we did so and threatened that if we refused, they would vote for TPR and adoption by the foster family. They threatened us to just “plead guilty” even though they knew we had done nothing wrong and that if we did plead guilty, it would get sent to TN and our other children would be taken from us. We could also be thrown in prison because child neglect is a class C felony in TN. They forced us to spend thousands of dollars in various expenses related to illegal kidnapping of our child while they were all making hundreds of thousands of dollars in federal funds and the foster parents were being paid \$2000/month with free healthcare/daycare to keep our daughter in their custody for no just cause. They punished us for complaining about their mistreatment by canceling our visits and shortening our bond times that we “were allowed” to have with our child. They tried on many occasions to get the TN DCS to take our older children from us and then contacted my ob-gyn’s office in 2020 to try to convince the medical staff there to seize our newborn baby boy (Sofia’s little brother) claiming that we might harm him. They were unsuccessful and none of our other children were ever taken out of our custody, but we are constantly made to live in fear that someday they might be. They caused us and our families and our other children immeasurable, immense, distress, suffering, pain both psychological and physical. We never got our daughter back; her brothers have never even gotten to meet her, and we have not been allowed to see her in person in over 10 months. We are seeking actual and punitive damages in the amount of 10 million dollars.